

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE:)	CHAPTER NO. 13
)	
)	BANKRUPTCY NO. 16-02335-JJT
Maryann T Venechanos)	
Debtor)	Nature of Proceeding
)	Motion for Relief from Automatic Stay
LSF9 Master Participation Trust)	
Movant,)	Related to Document # 62 & 63
)	
)	
Maryann T Venechanos)	
Respondents/Debtor)	
)	
Charles J DeHart, III, Standing Trustee)	
Additional Respondent)	

REQUEST TO CONTINUE HEARING/TRIAL WITH CONCURRENCE

This request must be filed at least twenty-four (24) hours prior to the hearing. All requests must be approved by the Court. Submitting a request is not an automatic continuance.

The undersigned hereby requests a continuance with the concurrence of the opposing party (parties). This is a first request for a continuance.

Reason for the continuance.

The parties require additional time to negotiate the Motion for Relief from Automatic Stay. We request a continuance of 2 weeks.

Contemporaneous with the filing of this request, the undersigned has served a copy of this request upon all counsel participating in this proceeding.

Dated 09/05/2017

/s/ Keri P. Ebeck
Keri P. Ebeck
Attorney I.D. No. 91298
Weltman, Weinberg & Reis Co., L.P.A.
436 Seventh Avenue, Suite 2500
Pittsburgh, PA 15219
412-434-7955